UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SOLOMON LEAKE and HAYDEN MAE LEAKE,

REOUEST FOR PRODUCTION OF DOCUMENTS

Plaintiffs,

-against-

07 Civ. 2947 (CM)

PHROSKA LEAKE McALISTER,

ECF CASE

Defendant.	

COUNSEL:

The plaintiffs, by their undersigned attorneys, request that the defendant, PHROSKA LEAKE McALISTER, produce and permit plaintiffs, their agents and attorneys, to inspect and to copy each of the following documents, including without limitation electronically stored documents and files, at the offices of McGarry & Simon, 317 Madison Avenue, Suite 1511, New York, New York 10017, on March 18, 2008, at 10:00 a.m.:

- A. all account statements, ledgers (including computer records) cancelled checks, deposit slips, debit and credit notices, signature cards, account agreements, correspondence and other records and documents whatsoever pertaining to any bank or security account or other account into which any assets of the plaintiffs or either of them were placed at any time between January 1, 1998 and the date of your response, including without limitation all accounts referred to in any of the pleadings herein;
- В. all account statements, ledgers (including computer records), cancelled checks, deposit slips, debit and credit notices, signature cards, account agreements, correspondence and other records and documents whatsoever pertaining to any bank or security account or other account to which the defendant, PHROSKA LEAKE McALISTER, had title and/or signing authority, either personally or in representative capacity, at any time between January 1, 1998 and the date of your response, including without limitation all accounts referred to in any of the pleadings herein;
- C. any and all powers of attorney executed by either of the plaintiffs at any time;
- D. any and all correspondence to or from the plaintiffs or either of them;
- E. any and all other correspondence, notes, memoranda, or documents, concerning any assets which now or formerly belonged legally or to the plaintiffs or either of them; and

F. all legal and other files created or maintained at any time concerning the plaintiffs or either of them.

Dated: New York, New York February 14, 2008

McGARRY & SIMON

William A. Simon (WS-4604)

Attorneys for Plaintiffs 317 Madison Avenue, Suite 1511 New York, New York 10017 Telephone No. (212) 867-0100 Facsimile No. (212) 867-3243

TO: PHROSKA L. McALISTER, ESQ. Attorney for Defendant 116 West 23rd Street, 5th Floor #197 New York, New York 10011 Telephone No. (212) 475-7085